

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,)	
)	JURY TRIAL DEMANDED
v.)	
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**DEFENDANT AND COUNTERCLAIMANT ROSS INTELLIGENCE INC.’S
MOTION TO EXCLUDE THE OPINIONS AND TESTIMONY OF PLAINTIFFS’
EXPERT JONATHAN L. KREIN**

Defendant and Counterclaimant ROSS Intelligence Inc. (“ROSS”) respectfully moves pursuant to Federal Rules of Evidence 702 and 403 for an order excluding the following opinions and related testimony of Plaintiffs’ expert Jonathan L. Krein.

1. That headnotes and the questions appearing in memos that are alleged to infringe are similar for failing to disclose what measure of similarity he uses;
2. That Defendant engaged in conduct violating the Copyright Act and rendering them liable for tortious interference; and
3. That there is a market for use of Plaintiffs’ materials as AI training data.

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10507723 / 20516.00001

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

By: /s/ David E. Moore

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